

ORIGINAL

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Vice President-Federal Regulatory

October 1, 1999

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EX PARTE

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
The Portals
445 12th Street, S.W.
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

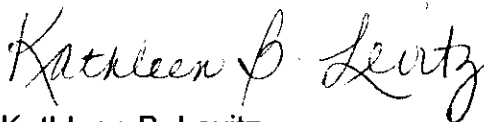
Re: CC Docket No. 98-121

Dear Ms. Salas:

On October 1, 1999 Gary Forsee, Bob Blau, Randy New, Bill Stacy, and I, representing BellSouth, met with Lawrence E. Strickling, Chief of the Commission's Common Carrier and members of his staff. Bureau staff attending the meeting included Carol Matthey, William Agee, and Andrea Kearney. The purpose of the meeting was to discuss the steps BellSouth needed to take to establish compliance with requirement that it provide nondiscriminatory access to its operation support systems in Georgia. The following attachments formed the basis for the presentation.

In accordance with Section 1.1206, I am filing two copies of this notice in the proceeding identified above and ask that you place this notice in the record of that proceeding.

Sincerely,



Kathleen B. Levitz

Attachments

cc: Lawrence E. Strickling (w/o attachments)
Carol Matthey (w/o attachments)
William Agee (w/o attachments)
Andrea Kearney (w/o attachments)

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SUMMARY OF OSS AND PERFORMANCE MEASUREMENT DOCKETS GEORGIA

I. Docket 6352-U Petition of AT&T for the Commission to Establish Resale Rules, Rates, Terms and Conditions and the Initial Unbundling of Services

- Petition to open docket filed December 21, 1995 in order to implement certain of the provisions of the Telecommunications and Competition Development Act of 1995, which was effective on July 1, 1995. This Act authorized multiple local competitors and provided generally for interconnection of competing local networks.
- Hearings held in March and April of 1996. Issues heard included the establishment of electronic operational interfaces for pre-service ordering, service ordering and provisioning, directory listing and line information databases, service trouble reporting and customer usage.
- In July 11, 1996 Order the Georgia Commission ordered the implementation of electronic interfaces for pre-ordering, ordering, maintenance and trouble reporting, and daily usage data. This order included the interactive direct order entry interface, as well as EDI.
- The Commission also began a monthly monitoring process that continues to this day, where BellSouth and the industry may submit surveillance reports to the Commission with regard to the implementation of electronic interfaces.

II The Arbitration Dockets

- In its arbitration case, AT&T raised numerous OSS related issues and the Commission heard testimony about the status of the interface development. In one of the several orders entered in this arbitration the Commission specifically dealt with issues related to access to customer service records.
- In the MCI arbitration, the Commission again was presented with evidence about the development of the OSS interfaces and MCI's positions with regard to the appropriate interfaces to be provided.

- In the Sprint arbitration the Commission again heard evidence about the development of OSS interfaces, and in particular about the provisioning of customer service records via a pre-ordering interface.

III. The 271 Dockets – 6863-U and 7253-U

- In connection with the Commission's review of the 14 point checklist and BellSouth's Statement of Generally Available Terms and Conditions, the Commission has held several hearings which have included testimony regarding BellSouth's OSS interfaces, the ordering of additional interfaces, (several of which were never used), and repeated assessments of the functionality of the interfaces that were being developed.
- The first hearings on BellSouth's SGAT took place in January and March of 1997. The Commission heard substantial testimony about the status of development of BellSouth's OSS. In its Order, it noted the importance of providing nondiscriminatory access to OSS as an "integral part" of providing access to UNEs and resold services. The Commission determined that the SGAT should not be approved because, among other things, BellSouth had not proven that it was able to fulfill the nondiscriminatory obligations with regard to access to OSS.
- The second round of hearings on BellSouth's SGAT/271 issues took place in July of 1997. At this hearing the Commission again heard substantial testimony from all parties relating to the development and needs for access to OSS. In its Order, the Commission noted BellSouth's substantial progress in developing interface access to its OSS, but concluded that further development would be necessary in order to demonstrate that the parity standard was met. It was in the October Order that the Commission decided to conduct the technical workshop that led to the establishment of Docket 8354-U.
- In its October Order, the Commission required BellSouth to begin filing surveillance reports demonstrating compliance with the performance measurements contained in the SGAT. This was prior to the adoption of the performance measurements in Docket 7892-U discussed below.

IV. The OSS Docket 8354-U

- In 1997 the Commission began a separate docket specifically to investigate the provision of electronic interfaces in Georgia. A workshop was held over a two-day period where all interested CLECs were invited to submit and discuss any and all improvements they would like to see in BellSouth's interfaces, Telecommunications Acts. From this workshop, the Commission Staff regardless of whether the improvements were required by the Federal or State developed a matrix of approximately 100 items that they felt needed to be accomplished. After a full hearing on these issues, the Commission adopted the Staff's recommendation and a reporting process was put in place to allow the industry to meet and report to the Commission on the status of implementation of these enhancements.
- With this extensive involvement with the development of the OSS interfaces and the wealth of surveillance information and hearing evidence that had been accumulated since the beginning of 1996, the Commission ordered that Third Party testing be commenced in an order dated May 20, 1999. General parameters of the test were set forth, and BellSouth was directed to file a detailed test plan for Commission consideration and approval. This plan was filed, and CLECs were given the opportunity to make comments and recommendations with regard to the testing process prior to Commission approval of the test plan. In its order approving the plan, the Commission also put in place a process for CLECs to receive interim reports on the progress of the testing and the opportunity to file comments and information with regard to these reports.

V. The Performance Measurement Docket 7892-U

- Also in 1997 the Commission opened a separate docket to investigate the adoption of performance measurements. Hearings were held in late 1997, and the Commission adopted a set of performance measurements in early 1998 that have been implemented. Monthly reports are submitted on all areas of service, including reports on how the OSS interfaces are working.

BellSouth OSS "Proofs" (R-resale, U- UNEs)

10-1-99 Exparte

System Function	EDI	TAG (incl - LENS'99)	LENS	LEO/ LESOG	LNP
Pre-ordering	Not Applicable	R,U - 3rd party testing	R - Commercial Volume	Not Applicable	Not Applicable
Ordering	R- GA docket; Commercial volumes U - 3rd party testing	R- GA docket; UNE - 3rd party testing	R - Commercial Volume	R - Commercial Volume; U- 3rd party testing	3rd party testing
Provisioning	R- GA docket; Commercial Volume UNE - 3rd party testing	3rd party testing	R - Commercial Volume	R - Commercial Volume	3rd party testing; commercial volume
Volume & scalability	R- GA docket; U - 3rd party testing	3rd party testing	Not Applicable	3rd party testing	3rd party testing
Integratability	(Cxr-to-Cxr)	3rd party testing (and cxr-to-cxr)	Not Applicable	Not Applicable	Not Applicable

System Function	TAFI	ECTA	DUF	CRIS	CABS
Maintenance & Repair	R - Commercial Volume	3rd party testing	R - Commercial Volume	R - Commercial Volume	R - Commercial Volume
M&R volume & scalability	3rd party testing; Commercial volume	3rd party testing	U - 3rd party testing	U - 3rd party testing	U - 3rd party testing
Billing	Not Applicable	Not Applicable	R - Commercial Volume; U- 3rd party testing	R - Commercial Volume; U- 3rd party testing	R - Commercial Volume; U- 3rd party testing

BellSouth CLEC OSS Interfaces and Processing
Current Volumes (Sept,1999)

INTERFACE					Electronic Processing
EDI	TAG	LENS	MANUAL		LEO / LESOG
1,866	1,177	83,288	61,274	Resale - Simple Residential	86,331
2,337	0	3,864	5,199	Resale - Simple Business	6,201
2,356	3	0	22,782	UNEs (incl NP)	2,359
6,559	1,181	87,152	89,255	TOTALS	94,892